

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:	:	
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THE FINANCIAL OVERSIGHT AND	:	PROMESA
MANAGEMENT BOARD FOR PUERTO RICO,	:	Title III
	:	
as representative of	:	Case No. 17-BK-3283 (LTS)
	:	
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors. <sup>1</sup>	:	
	:	
	X	

**SECOND AMENDED<sup>2</sup> INFORMATIVE MOTION OF  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
REGARDING SEPTEMBER 21-22, 2021, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)<sup>3</sup> hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for September 21-22, 2022, Omnibus Hearing* [Case No. 17-3283, Docket No. 22038] (the “Scheduling Order”) and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Out of an abundance of caution, the Committee files this second amended informative motion in accordance with this Court’s order, dated September 17, 2022 [Docket No. 22272], to clarify that, at the September 21, 2022 hearing, counsel to the Committee will also address the Oversight Board’s urgent motion [Docket No. 22269] and related pleadings, as further detailed below.

<sup>3</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. Luc A. Despins and G. Alexander Bongartz of Paul Hastings LLP will appear telephonically on behalf of the Committee at the Hearing (as defined in the Scheduling Order), and address, as necessary, the following matters:<sup>4</sup>

- (a) Status Report to be filed by the Oversight Board;
- (b) Status Report to be filed by AAFAF;
- (c) *Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant to Litigation Schedule and (II) Granting Related Relief* [Case No. 17-3283, Docket No. 22269; Case No. 17-4780, Docket No. 2956];
  - 1. *Limited Response of Official Committee of Unsecured Creditors with Respect to Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant to Litigation Schedule and (II) Granting Related Relief* [Case No. 17-3283, Docket No. 22284; Case No. 17-4780, Docket No. 2968];
  - 2. *Response and Objection of Fuel Line Lenders to Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant to Litigation Schedule and (II) Granting Related Relief* [Case No. 17-3283, Docket No. 22282; Case No. 17-4780, Docket No. 2963];

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<sup>4</sup> In accordance with the Scheduling Order, the time allotments for the various speakers on the matters set forth in (c), (d), (e), (f), and (g) below will be provided in separate joint informative motions.

3. *Response of the Puerto Rico Fiscal Agency and Financial Advisory Authority to Urgent Motion of Financial Oversight and Management Board for Order (I) Establishing the Schedule to Continue Negotiations During Litigation of Gating Issues Pursuant to Litigation Schedule, and (II) Granting Related Relief* [Case No. 17-3283, Docket No. 22285; Case No. 17-4780, Docket No. 2967];
4. *Response by the Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Syncora Guarantee Inc. to the Oversight Board's Urgent Motion to Set a Litigation Schedule, and Urgent Cross-Motion to Establish a Case Schedule and Impose Deadlines for a PREPA Plan of Adjustment* [Case No. 17-3283, Docket No. 22286; Case No. 17-4780, Docket No. 2966];
- (d) *Statement of Official Committee of Unsecured Creditors with Respect to Termination of PREPA Mediation* [Case No. 17-3283, Docket No. 22278; Case No. 17-4780, Docket No. 2960];
- (e) Any objections, responses, statements, joinders, or replies to any of the foregoing; and
- (f) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing telephonically.

WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: September 19, 2022

/s/ Luc A. Despins

PAUL HASTINGS LLP  
Luc. A. Despins, Esq. (Pro Hac Vice)  
James R. Bliss, Esq. (Pro Hac Vice)  
Nicholas A. Bassett, Esq. (Pro Hac Vice)  
G. Alexander Bongartz, Esq. (Pro Hac Vice)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
lucdespins@paulhastings.com  
jamesbliss@paulhastings.com  
nicholasbassett@paulhastings.com  
alexbongartz@paulhastings.com

*Counsel to the Official Committee of Unsecured Creditors*

- and -

/s/ Juan J. Casillas Ayala

CASILLAS, SANTIAGO & TORRES LLC  
Juan J. Casillas Ayala, Esq. (USDC - PR 218312)  
Israel Fernández Rodríguez, Esq. (USDC - PR 225004)  
Juan C. Nieves González, Esq. (USDC - PR 231707)  
Cristina B. Fernández Niggemann, Esq. (USDC - PR 306008)  
PO Box 195075  
San Juan, PR 00919-5075  
Tel.: (787) 523-3434  
Fax: (787) 523-3433  
jcasillas@cstlawpr.com  
ifernandez@cstlawpr.com  
jnieves@cstlawpr.com  
cfernandez@cstlawpr.com

*Local Counsel to the Official Committee of Unsecured Creditors*

**Exhibit A**

PARTY APPEARANCE SHEET

Name of Party	Official Committee of Unsecured Creditors
Party Name Abbreviation (For Use with Zoom)	Creditors' Committee
<p>Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party):</p> <ul style="list-style-type: none"> <li>• Name,</li> <li>• Email,</li> <li>• Law Firm,</li> <li>• Phone Number</li> <li>• Docket Entry No. for the Attorney's Notice of Appearance</li> <li>• Zoom Screen Name (See Pretrial Conference Procedures Order ¶ 6(a))</li> </ul> <p>or</p> <p>Party-in-interest Not Represented by Counsel:</p> <ul style="list-style-type: none"> <li>• Name, Email, Phone Number, Proof of Claim Number (if any)</li> </ul>	<p>Luc A. Despins lucdespins@paulhastings.com Paul Hastings LLP (212) 318-6001 Docket No. 494 Creditors' Committee/ Despins, Luc/ Paul Hastings LLP</p> <p>G. Alexander Bongartz alexbongartz@paulhastings.com Paul Hastings LLP (212) 318-6472 Docket No. 494 Creditors' Committee/ Bongartz, Alex/ Paul Hastings LLP</p>
Plan Objection Docket Entry No.	
Witness List Docket Entry No.	
Exhibit List Docket Entry No.	
Other Statement Docket Entry No.	
If a Party files a supplemental Party Appearance Cover Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	